



March 11, 2025

**VIA ECF**

Hon. Jessica G.L. Clarke  
 Daniel Patrick Moynihan  
 United States Courthouse  
 500 Pearl St.  
 New York, NY 10007-1312

**Eric J. Berger**  
 Direct Phone 212-908-1279  
 Direct Fax 877-434-1068  
 eberger@cozen.com

**MEMO ENDORSED**

**Re: *Riverkeeper, Inc. and Save the Sound, Inc. v. National Express LLC and White Plains Bus Co., Inc.***  
**Docket No.: 7:24-cv-09676-JGLC**

Dear Judge Clarke:

This firm was recently retained to represent defendants, National Express LLC and White Plains Bus Co., Inc., in the above-captioned matter. I and my colleague, Meredith Renquin, Esq., noticed our appearances this past Friday, March 7, 2025.

Please allow this letter to serve as an application for a 60-day adjournment of the (i) March 19, 2025 deadline to submit a proposed Civil Case Management Plan and Scheduling Order and joint letter; (ii) March 26, 2025 Initial Pretrial Conference; and (iii) April 4, 2025 deadline to respond to the Complaint.

In addition to requiring some additional time to get up to speed on this environmental matter, Ms. Renquin and I have had discussions with plaintiffs' counsel, Reed W. Super, Esq., regarding the potential for fully resolving the matter before engaging in formal discovery and any responsive pleading or motion practice. As such, all parties agree that a 60-day adjournment will be beneficial in that it will allow the parties, their counsel and environmental consultants to focus their resources on settlement.

At the end of the 60-day adjournment, the parties would report to the Court on the prospects of reaching a complete settlement expeditiously, and if not, will submit a proposed Civil Case Management Plan and Scheduling Order and joint letter that has been more thoroughly informed by their substantive discussions.

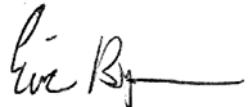
Thank you for your consideration.

Hon. Jessica G.L. Clarke  
March 11, 2025  
Page 2

---

Respectfully submitted,

COZEN O'CONNOR

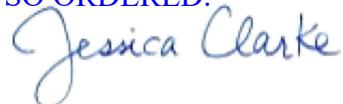


By: Eric J. Berger

cc: All Counsel via ECF

Application GRANTED. The Court encourages the parties to consider whether they would like to be referred to the Mediation Program or to Judge Reznik for a Settlement Conference. Parties may make this request at any time. Parties to submit a joint case management plan by **May 21, 2025**. Defendants to respond to the Complaint by **June 4, 2025**. The conference scheduled for March 26, 2025 is ADJOURNED to **May 28, 2025** at 11:00 a.m. The conference will be held remotely by Microsoft Teams. Counsel will receive Microsoft Teams log-in credentials at the email addresses listed on the docket. The public listen-only line may be accessed by dialing: 646-453-4442 | Access Code: 757578439#.

SO ORDERED.



JESSICA G. L. CLARKE  
United States District Judge

Dated: March 12, 2025

New York, New York